

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

TROY E. TILLERSON,

Plaintiff,

vs.

THE MEGA LIFE AND HEALTH
INSURANCE CORPORATION, a
corporation; TRANSAMERICA LIFE
INSURANCE COMPANY F/K/A PFL
LIFE INSURANCE COMPANY, a
corporation; NATIONAL ASSOCIATION
FOR THE SELF EMPLOYED A/K/A
NASE, a corporation,

Defendants.

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CASE NO. 3:05-cv-985-MEF

**JOINT MOTION FOR EXTENSION
OF REMAINING DEADLINES IN SCHEDULING ORDER**

COME NOW, all of the parties, by and through their respective undersigned counsel, and jointly request that the Court extend the remaining deadlines contained in the scheduling order for this case, and in support hereof state as follows:

1. On October 16, 2006, this Court entered a scheduling order outlining certain deadlines for this case (the "Scheduling Order"). The trial of this case is set for the civil trial term commencing on June 25, 2007.

2. In the Scheduling Order, the deadline for discovery is February 9, 2007. On February 7, 2007, the Court entered an Order giving the parties an additional 10 days, until February 19, 2007, to complete discovery.

3. On February 9, 2007, the plaintiff filed a renewed motion for enlargement of the discovery deadlines, noting the impending arrival of plaintiff's counsel's fourth child and the unknown length of time that would be needed to complete the depositions of the defendants. Counsel for defendants did not object to the plaintiff's request for an additional 60 days to complete discovery in this case.

4. On February 12, 2007, the Court granted the plaintiff's motion, extending the discovery deadline through April 20, 2007.

5. As a result of the 60-day extension of the discovery period, the parties request that the remaining deadlines in the Scheduling Order also be extended. For example, the deadlines to provide expert reports, file dispositive motions, and have a face-to-face settlement conference, which should be and in fact were set by the Court on dates that follow the close of discovery, are now almost two months before the close of discovery.

6. Specifically, the parties respectfully request that the Court extend the following pre-trial deadlines, as suggested below:

<u>Description:</u>	<u>Date:</u>
Plaintiff's deadline to identify experts	February 28, 2007
Defendants' deadline to identify experts	March 28, 2007
Parties' deadline to provide expert reports	April 6, 2007
(Parties' discovery deadline is now April 20, 2007.)	
Parties' deadline to file dispositive motions	May 25, 2007
Parties' deadline to conduct a face-to-face settlement conference	July 9, 2007

Exchange of names, addresses and telephone numbers of all witnesses, except witnesses solely for impeachment purposes; identification of any part of a deposition or other document for use at trial; furnish opposing counsel all exhibits or tangible evidence for use at trial.

September 17, 2007

Pretrial Conference

October 4, 2007

7. The parties also request that the Court continue the trial date until the Court's next civil trial term in November.

8. Attached is a proposed Order for the Court's consideration.

WHEREFORE, premises considered, the parties request that the Court amend its Scheduling Order to extend the remaining deadlines as addressed in this joint motion.

Dated: February 16, 2007.

*This motion has been e-filed
with the express permission of:*

s/Steven W. Couch

STEVEN W. COUCH (COU014)

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